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**NORTHEAST IMPLEMENTATION TEAM**

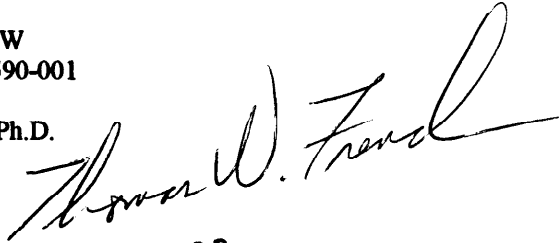
**c/o Protected Resources Division  
National Marine Fisheries Service  
1 Blackburn Drive  
Gloucester, MA 01930**

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2 March 2001

**TO:** Docket Management Facility [USCG-2000-6931]  
U.S. Department of Transportation  
Room PL-401  
400 Seventh Street SW  
Washington, DC 20590-001

**FROM:** Thomas W. French, Ph.D.  
Chair



**SUBJ.:** Comments to the Docket [USCG-2000-6931], Fire Suppression Systems and Voyage Planning for Towing Vessels

The comments that follow are submitted on behalf of the Northeast Implementation Team in response to the request for comments in the Federal Register/Volume 65, No. 250 [USCG-2000-6931]. The Team is an eighteen member advisory group established by the National Marine Fisheries Service (NMFS) to help implement the federal endangered species recovery plans for the Northern Right and the Humpback Whales. The members represent a wide range of federal and state agencies as well as one member from the Canadian Department of Fisheries and Oceans. The Team also has Technical Associates appointed by the Team, which include whale biologists and representatives of the shipping industry.

The Team endorses the requirement for proper voyage planning by owners or operators, and masters of towing vessels prior to the commencement of trips regardless of whether a barge is in tow. In the opinion of the Team, voyage planning reduces the risk of operational mishaps on towing vessels associated with human error thereby limiting the loss of human life, diminishing property damage, and in particular, reducing the threat to the marine environment and maritime commerce.

We strongly recommend that the responsibility for voyage/passage planning be dictated by regulation and that guidelines be developed for the four distinct stages of safe passage planning to include guidance on:

1. Appraisal
2. Planning
3. Execution
4. Monitoring

Of particular concern to the Team, is that the planning process clearly addresses:

1. Mandatory ship reporting requirements
2. Route coordinates that intersect areas that have been designated as critical habitat for endangered species
3. Time of entry and departure from areas designated as critical habitat for endangered species
4. Watch conditions with respect to manning levels and lookouts posted while transiting in or near areas designated as critical habitat for endangered species

5. Vessel speeds and engine maneuvering status while transiting in or near areas designated as critical habitat for endangered species
6. Ship-strike avoidance procedures or countermeasures while transiting in or near areas designated as critical habitat for endangered species
7. Reporting procedures for endangered species sightings
8. Reporting procedures for ship-strikes with endangered species in particular the Northern Right Whale.

The Team believes that these recommendations are consistent with the U.S. Coast Guard's Principles of Prevention Through People (PTP) as well as the goals and objectives set forth in the Endangered Species Act, Marine Mammal Protection Act and the Marine Sanctuaries Act.